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## Dear Ms. Chopin and Mr. Hurt:

On behalf of the Maryland Bicycle and Pedestrian Advisory Committee (MBPAC), I am writing to provide comments on the "I-495 & 1-270 Managed Lanes Study: Draft Environmental Impact Statement (DEIS) and Draft Section 4(f) Evaluation". The advisory committee was established in 1991 by § 2-606 of the Transportation Article of the Maryland Code, with the purpose of advising state agencies on bicycle and pedestrian (bike-ped) issues. Although our focus is transportation, our comments are relevant to both MDOT and MDE because some alternatives for improving bike-ped impacts would also reduce impacts on nontidal wetlands and floodplains. At its quarterly meeting in July, the committee decided to review the Managed Lanes Study and provide comments in accordance with MBPAC's charter.

As envisioned, the Managed Lanes Project would make a major contribution to bicycle and pedestrian transportation in the greater Washington Area by including a multiuse trail on the new American Legion Bridge over the Potomac River. We are also pleased to note that the plans as conveyed in the DEIS are satisfactory in identifying pedestrian considerations, including those faced by individuals with disabilities.

On the other hand, the Managed Lanes Project as envisioned in the draft study is likely to have several adverse impacts on bicycle and pedestrian transportation across I-495 and I-270, especially in Prince George's County. In many locations, these two interstate highways are significant barriers to bicycle and pedestrian transportation because they cannot be safely or conveniently crossed. During the last few decades, state and local governments have been gradually mitigating these barriers by building pedestrian bridges over the highways and trails that cross underneath the highways, and by retrofitting interchanges with improved bike-ped accommodation. Additional improvements are included in approved plans or are under



consideration—and these improvements are likely to continue. Depending on design, the Managed Lanes Project could either thwart or accelerate ongoing and planned improvements to bike-ped transportation across I-270 and I-495.

We believe that the DEIS and the Section 4(f) evaluation each need a section to explicitly address how and where this project may affect bicycle and pedestrian transportation. Widening an interstate roadbed will generally increase the cost of, and possibly preclude, planned trail crossings; but alternative designs could facilitate crossings. For example, in 2008, the Maryland National Capital Parks and Planning Commission (M-NCPPC) completed 30% design plans to extend the Henson Creek Trail across the Capital Beltway to the Branch Avenue Metrorail Station. M-NCPPC asked MDOT for permission to run the trail through one of the culverts the creek follows under the Beltway. Secretary John Porcari denied the request for safety reasons but added:

"If the culverts at Henson Creek are replaced by a bridge, we could certainly reinitiate discussions regarding a trail crossing during the project planning process."

Widening the roadbed and lengthening the culvert would tend to preclude the eventual crossing envisioned by Secretary Porcari's letter, which is an environmental impact that the DEIS should consider. The Section (4)(f) evaluation could also consider the bridge alternative, to mitigate the impact on park amenities of widening the highway over a longer culvert. (A bridge can also have a smaller environmental impact on nearby wetlands and floodplains than a culvert.)

The DEIS and Section 4(f) evaluation should consider the potentially significant impacts of the Managed Lanes Project on several other planned and potential bicycle and pedestrian crossings, as well as ways to mitigate such impacts. For each crossing, a key question for the DEIS is whether the Managed Lanes Project facilitates the needed crossing or decreases its feasibility. Where the Capital Beltway crosses a park stream valley, a key question for the Section 4(f) evaluation would be whether replacing a culvert with a bridge, lengthening an existing bridge to create more room for a shared-use path, or building a bike-ped tunnel would mitigate the impact on park resources.

Although a complete list of such impacts is beyond our capacity, MBPAC members have identified the following crossings based on published plans and consultation with local planners:

- Trails crossing under the Capital Beltway along Little Paint Branch and Henson Creek, originally proposed to MDOT during the 2000's (EIS and 4f implications);
- A trail crossing the Capital Beltway at Southwest Branch (EIS and 4f implications);
- A planned pedestrian bridge over the Capital Beltway connecting Whitfield Chapel Park to the New Carrollton Station (EIS and 4f implications);



- Possible pedestrian bridges as part of the Central Avenue Trail north of Central Avenue, between Woodmore Town center and the former Landover Mall site, and east of MD 201;
- The planned extension of the WB&A Trail over the Capital Beltway along the MD 704 bridge;
- Sidepaths at the Capital Beltway interchanges with MD 210, MD 4, MD 202, MD 193, MD 201, and US 1;
- Sidepaths along Cherry Hill Rd and Arena Drive Temple Hill Road over the Capital Beltway;
- Sidepaths along Rhode Island Avenue, MD 193, MD 450, Richie Marlboro Road, and Suitland Parkway under the Capital Beltway;
- Widening sidewalks over the Capital Beltway along Fernwood and Greentree roads;
- Adding sidewalks to one or both sides of bridges where Bradley Boulevard, Rockville Pike, and Persimmon Tree Road cross over the Capital Beltway;

The EIS should also consider the MNCPPC list of Master-Planned Bicycle-Pedestrian Accommodations and the Capital Trails Network.

Finally, the committee is concerned that the DEIS fails to answer a number of key questions concerning the potential impacts on bike-ped safety. What measures (if any) will be taken at the highway ramps to mitigate potential hazards from the anticipated increase in motor vehicle traffic? What will be the impact of the new ramps that lead directly to the toll lanes? Will the absence of toll-road ramps at some interchanges increase the traffic on roads parallel to the managed lanes, and thereby create additional hazards to bicycles and pedestrians, or will the project take measures to avoid such hazards?

We appreciate the opportunity to provide our comments on the draft Managed Lanes Project and look forward to seeing the next version of this important analysis.

Yours truly,

Jonathan B. Morrison, Chairperson